

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD.,
SAMSUNG ELECTRONICS AMERICA,
INC.,

Defendants.

Case No. 2:23-cv-00103-JRG-RSP

JURY TRIAL DEMANDED

**DECLARATION OF REZA MIRZAIE IN SUPPORT OF PLAINTIFF HEADWATER
RESEARCH LLC'S MOTION TO STRIKE CERTAIN OPINIONS OF SAMSUNG'S
DAMAGES EXPERT DR. M. RAY PERRYMAN, PH.D.**

I, Reza Mirzaie, declare as follows:

1. I am counsel for Headwater Research LLC in the above-captioned action. I provide this declaration in support of Headwater's to Motion to Strike Certain Opinions of Samsung's Damages Expert Dr. M. Ray Perryman, Ph.D.. I have personal knowledge of the facts set forth herein, and if called upon to testify, could and would testify competently thereto.

2. Attached as Exhibit 1 is a true and correct copy of excerpts from the rebuttal expert report of Dr. M. Ray Perryman, dated October 14, 2024.

3. Attached as Exhibit 2 is a true and correct copy of the Deposition Transcript of Dr. M. Ray Perryman, dated October 24, 2024.

4. Attached as Exhibit 3 is a true and correct copy of Samsung's 2019 Settlement and License Agreement with Seven Networks LLC (SAM-HW00688966-SAM-HW00689025), dated January 7, 2019.

5. Attached as Exhibit 4 is a true and correct copy of Samsung's 2020 settlement agreement with Bell Northern Research, October 7, 2020.

6. Attached as Exhibit 5 is a true and correct copy of excerpts from the Opening Report of Dr. Ian Foster, dated September 26, 2024.

7. Attached as Exhibit 6 is a true and correct copy of excerpts from the Rebuttal Report of Dr. Ian Foster, dated October 14, 2024.

8. Attached as Exhibit 7 is a true and correct copy of *EcoFactor, Inc. v. ecobee, Inc.*, No. 6:21-cv-00428-ADA, D.I. 208, dated June 1, 2023.

9. Attached as Exhibit 8 is a true and correct copy of *EcoFactor, Inc. v. ecobee, Inc.*, No. 6:21-cv-00428-ADA, D.I. 209, dated June 1, 2023.

10. Attached as Exhibit 11 is a true and correct copy of *360Heros, Inc. v. GoPro, Inc.*,

1-17- cv-01302 (DDE), D.I. 347, dated April 19, 2023.

11. Attached as Exhibit 12 is a true and correct copy of Depuy Synthes Prods., LLC v. Globus Med., Inc., 11-652-LPS (DDE), D.I. 268, dated May 15, 2023.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 25, 2024 at Los Angeles, California.

By: /s/ Reza Mirzaie
Reza Mirzaie